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FENNEMORE CRAIG

A PROFESSIONAL CORPORATION

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PHOENIX, ARIZONA 85012-2913

PHONE: (602) 916-5000

FAX: (602) 916-5999

January 20, 2005

BY HAND DELIVERY

Ernest Johnson, Director
Utilities Division
Arizona Corporation Commission
1200 W. Washington St.
Phoenix, Arizona 85007

Arizona Corporation Commission

DOCKETED

JAN 20 2005

DOCKETED BY

AZ CORP COMMISSION
DOCUMENT CONTROL

2005 JAN 20 P 4:29

RECEIVED

Re: Johnson Utilities Company: Compliance with Decision No. 65840
Notification of ADEQ Notice of Violation
WS-02987A-99-0583; WS-02987A-00-0618

Dear Mr. Johnson:

Pursuant to Commission Decision No. 65840 (April 22, 2003), enclosed please find a Notice of Violation ("NOV") issued by the Arizona Department of Environmental Quality ("ADEQ") and received by Johnson Utilities Company ("Johnson") on January 6, 2005. **See Attachment 1.**

Also enclosed is a January 19, 2005 letter and response from Johnson's Vice President, Brian Tompsett, to William Hare of ADEQ. **See Attachment 2.** As noted in Mr. Tompsett's letter, Johnson instituted intervention and preventative measures that now demonstrate compliance with ADEQ's technical review criteria for fecal coliform exceedances.

Pursuant to Decision No. 65840, Johnson will continue to provide you documentation of "all relevant documents, including but not limited to any documents, or pleadings filed with ADEQ and or by JUC relating to the NOV and the steps JUC takes to come into compliance, until the ultimate resolution of the NOV."

FENNEMORE CRAIG

BY HAND DELIVERY

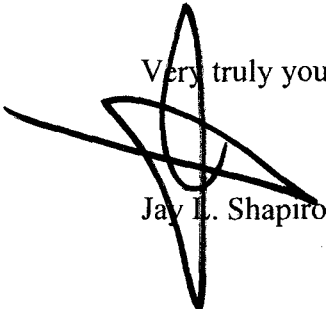
Ernest Johnson, Director

January 20, 2005

Page 2

Should you have any questions, please do not hesitate to call me at your convenience.
Thank you for your time in this matter.

Very truly yours,



Jay L. Shapiro

enclosures

cc: Brian Bozzo, Compliance Section (w/enc.)
Brian Tompsett, Johnson Utilities (w/enc.)
Docket Control (w/enc.)

1628404.1/51239.001

ATTACHMENT 1

RECEIVED JAN 10 2005



Janet Napolitano
Governor

ARIZONA DEPARTMENT
OF
ENVIRONMENTAL QUALITY

1110 West Washington Street - Phoenix, Arizona 85007
(602) 771-2300 - www.azdeq.gov



Stephen A. Owens
Director

Ref: #FS05-407
January 3, 2005

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Brian Tompsett, Vice President
Johnson Utilities Company
5230 East Shea Blvd.
Scottsdale, Arizona 85254

Re: Annual Compliance Inspection of the Johnson Utilities Section 11 Wastewater Treatment Plant (WWTP), Inventory No. 103081, Aquifer Protection Permit (APP) No. P103081 Reuse Permit No. R103081, Middle Gila River Watershed

Dear Mr. Tompsett:

Enclosed is a Notice of Violation ("NOV") and inspection report prepared by William J. Hare concerning the compliance inspection conducted at the site on October 27, 2004. The NOV is being issued for continued exceedances in Fecal Coliform levels of the effluent that is discharged to a nearby golf course.

As indicated in the enclosed "Summary of Inspection", the Notice of Violation previously issued on September 2, 2004 remains open. The referenced NOV was issued for permit violations regarding effluent monitoring for Fecal Coliform and Total Nitrogen. The referenced NOV will remain open until sufficient data is submitted in the ensuing months that indicate the operational problems have been corrected.

The attached Notice of Violation ("NOV") is an informal compliance assurance tool used by the Arizona Department of Environmental Quality ("ADEQ") to put a responsible party (such as a facility owner or operator) on notice that the Department believes a violation of an environmental requirement has occurred. It describes the facts known to ADEQ at the time of issuance and cites the requirement that ADEQ believes the party has violated.

Although ADEQ has the authority to issue appealable administrative orders compelling compliance, an NOV has no such force or effect. Rather, an NOV provides the responsible party an opportunity to do any of the following before ADEQ takes formal enforcement action: (1) meet with ADEQ and discuss the facts surrounding the violation, (2) demonstrate to ADEQ that no violation has occurred, or (3) document that the violation has been corrected.

ADEQ reserves the right to take a formal enforcement action, such as issuing an administrative order or filing a civil lawsuit, regardless of whether the Department has issued an NOV. Neither

Northern Regional Office
1515 East Cedar Avenue • Suite F • Flagstaff, AZ 86004
(928) 779-0313

Southern Regional Office
400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733

ADEQ's issuance of an NOV nor its failure to do so precludes the Department from pursuing these remedies. However, the timeliness of a complete response to this notice will be considered by ADEQ in determining if and how to pursue such remedies.

If you have any questions, regarding the above, please contact William J. Hare at (602) 771-4838.

Sincerely,

Christy Love for Romann Diaz

Romann G. Diaz, Manager
Water Quality Field Services Unit

cc: Pinal County Health Department
Facility File, Inventory No.103081
WQFSU Reading File
Vivian Burns, Program and Project Specialist



Janet Napolitano
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street Phoenix, Arizona 85007
(602) 771-2300 www.adeq.state.az.us



Stephen A. Owens
Director

CERTIFIED MAIL
Return Receipt Requested

Case ID #: 33138

January 3, 2005

Johnson International Inc
Attention: Brian Tompsett
5230 E Shea Blvd Ste 200
Scottsdale, AZ 85254-5750

Subject: Mgd Precision Golf Course Wwtp, 142
1877 E Bella Vista Rd / Queen Creek, AZ 85242

NOTICE OF VIOLATION

The Arizona Department of Environmental Quality (ADEQ), has reason to believe that Johnson International Inc as the owner/operator of Mgd Precision Golf Course Wwtp, has violated a requirement of the Arizona Revised Statutes (A.R.S.), a rule within the Arizona Administrative Code (A.A.C.), or an applicable permit/license, administrative order or civil judgment. ADEQ discovered the violations alleged below during an inspection completed on October 27, 2004.

I. LEGAL AUTHORITY and NATURE OF ALLEGED VIOLATION(S)

1. Permit 24069 (P103081) - 4.0

The single sample maximum of fecal Coliform for effluent monitoring is 800 c.f.u./100ml.

During the 3rd quarter of 2004 the facility exceeded the single sample maximum of fecal Coliform effluent monitoring on 29 occasions. Twenty eight of these exceedances were > 1,600 c.f.u./100ml

2. Permit 24069 (P103081) - 4.0

The Fecal Coliform limit for the four out of seven samples for weekly monitoring is 200 c.f.u.

During the weeks commencing on July 1, 2004, July 8, 2004 and July 29, 2004 the facility exceeded the Discharge Limit for effluent monitoring of 200 c.f.u. on at least four or more occasions.

II. DOCUMENTING COMPLIANCE

1. Within 60 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or the results of the investigative inquiry regarding the cause of the fecal Coliform exceedances and most recent results effluent sampling.

Northern Regional Office
1515 East Cedar Avenue Suite F Flagstaff, AZ 86004
(928) 779-0313

Southern Regional Office
400 West Congress Street Suite 433 Tucson, AZ 85701
(520) 628-6733

Printed on recycled paper

III. SUBMITTING COMPLIANCE DOCUMENTATION

Please send all compliance documentation and any other written correspondence regarding this Notice to ADEQ at the following address:

Arizona Department of Environmental Quality, Attention: William J. (Bill) Hare, Water Quality Field Service Compliance Unit, 1110 W Washington St, Phoenix, AZ 85007 MC: 5415B-1

IV. STATEMENT OF CONSEQUENCES

1. The time frames within this Notice for achieving and documenting compliance are firm limits. Failure to achieve or document compliance within the time frames established in this Notice will result in an administrative compliance order or civil action requiring compliance within a reasonable time frame, substantial civil penalties, and/or the suspension or revocation of an applicable permit/license. ADEQ will agree to extend the time frames only in a compliance schedule negotiated in the context of an administrative consent order or civil consent judgment.
2. Achieving compliance does not preclude ADEQ from seeking civil penalties, and/or suspending or revoking an applicable permit/license for the violation(s) alleged in this Notice as allowed by law.

V. OFFER TO MEET

ADEQ is willing to meet regarding this Notice. To obtain additional information about this Notice or to schedule a meeting to discuss this Notice, please contact William J. (Bill) Hare at (602) 771-4838.

 for Romann Diaz
Romann G. Diaz, Manager
Water Quality Field Service Compliance Unit


William J. (Bill) Hare
Water Quality Field Service Compliance Unit

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
WATER QUALITY DIVISION - WATER QUALITY COMPLIANCE SECTION
Field Services Unit

SUMMARY OF INSPECTION - WASTEWATER

Facility: Section 11 WWTP

Place ID No: 142

Aquifer Protection Permit: P103081

AZPDES Permit No: N/A

Reuse Permit No: Type 3 General Permit, R105412

Inventory No: 103081

Inspected by: William J. Hare, E.P.S.

Inspection Date: October 27, 2004

Accompanied by: Gary Bamber, Gary Larsen
Greg Brown, Jerry Beeler

Report Date: January 3, 2005

YES NO N/A UNKNOWN

1. WWTF quality meets the following permit requirements:
 - A. Aquifer Protection Permit
 - B. Reuse Permit
 - C. AZPDES Permit
2. A certified operator is employed by the owner per ADEQ regulations.
3. This system meets APP permit requirements for operation and maintenance.

	X*		
		X	
		X	
X			
X			

*The NOV previously issued in September 2004 remains open. The referenced NOV was issued for numerous exceedances in effluent monitoring for Fecal Coliform and Total Nitrogen. In addition, a new NOV is being issued for the continued exceedances in effluent monitoring for Fecal Coliform.

Inspection Purpose and Scope:

This was the annual inspection to determine compliance with the existing APP and Reuse Permits.

Facility Description:

The Johnson Utilities Section 11 WWTP is located adjacent to Hunt Highway, approximately nine miles southeast of Queen Creek. The WWTP has the capacity to collect and treat up to a maximum monthly average flow of 1.6 million gallons per day flow (MGD) of wastewater received from residences and small businesses located in the central and southern portions of the Johnson Utilities service area. The treatment process consists of a headworks with a bar screen, a

flow splitter box, four aerated lagoons, 32 wetland cells, liquid chlorine disinfection and an effluent pump station. All of the lagoons and 32 wetland cells of the WWTP have a permeability of less than 550 gallons per day per acre. The WWTP process employs nitrification-denitrification to achieve an effluent Total Nitrogen level of 10 mg/L and chlorine disinfection.

General Information and Observations:

The monthly average for influent daily flow rates has ranged from 500,000 – 550,000 g.p.d in recent months. Peak flows have exceeded 800,000 g.p.d. The effluent is currently being discharged to the nine hole Oasis Golf Course as authorized in the Type 3 Reclaimed Water General Permit. On rainy days in the winter months, some effluent is discharged into one of the recharge basins. About 95% of the effluent is being discharged to irrigate the Oasis Golf Course, located close to the WWTP. Only one of the four recharge basins contained any effluent.

The facility reported that there are about 6,900 homes connected to the sewer system as of October 26, 2004. This includes homes from the San Tan Heights Community and homes from the Copper Basin Community. Both San Tan and Copper Basin communities will eventually have their own WWTPs. Influent flows to a common vault, where it is pumped to the Section 11 WWTP. A 1.0 MGD WWTP is being constructed at the San Tan Community area. Construction of the Copper Basin WWTP is currently underway. The facility currently has a design capacity of 1.6 million gallons per day (MGD). The Arizona Corporation Commission (ACC) has issued a Certificate of Convenience and Necessity (CCN) for this utility that authorizes the treatment of up to 2.4 MGD of wastewater within in the service area of the WWTP.

The inspection of the aerated lagoons did not reveal any deficiencies. The water level was about 7 feet deep with 3 feet of freeboard. The color of the lagoons was good. No septic odors were present. All of the aerators were reported to be functional. The dissolved oxygen (DO) levels in the aerated lagoons were reported to range from 6-8 mg/L.

The 16 wetland cells were also inspected and found to be functioning adequately. The water level was adequate. Some of the wetland cells had been previously burned to remove dead vegetation. These cells were experiencing re-growth. The short circuiting of the wetland cells, which caused excessive water levels in some areas, appears to have been corrected. This short circuiting hampered the denitrification process.

The chlorine contact chamber (CCA) appeared to be functioning adequately. The piping for the delivery of the liquid chlorine was replaced last month, after it was found to be restricted with (crystallized) sodium hypochlorite. This was causing high levels of Fecal Coliform in the effluent that is being delivered to the Oasis Golf Course.

APP Inspection, LTF No. 24069

Previously issued NOV

On September 2, 2004, ADEQ issued a Notice of Violation (NOV), Case ID No. 32021, to Johnson Utilities for various exceedances that occurred in the 4th quarter of 2003, the 1st quarter

of 2004 and the 2nd quarter of 2004. The facility experienced numerous exceedances for effluent monitoring during the aforementioned quarters. The exceedances entailed 58 occasions when the effluent was less than 1600 c.f.u./100ml during the 2nd quarter of 2004. In addition, the facility had several exceedances in Total Nitrogen levels for the effluent that occurred during the 4th quarter 2003 and the 1st and 2nd quarters of 2004. The referenced NOV also included violations of the contingency requirements of the APP, which required verification sampling. No verification sampling had been conducted for the aforementioned violations.

On September 10, 2004, Johnson Utilities (JU) issued a written response to the aforementioned violations explaining operational difficulties and intervention and preventative measures implemented to correct the problems. In addition, ADEQ had received verbal explanations from the operator addressing the violations. According to the operator, the Fecal Coliform exceedances were partially caused by a blockage in the liquid chlorine tubing to the chlorine contact chamber and a large chlorine demand from an algae bloom in the various wetland cells. JU's written response to the NOV advised that the Total Nitrogen exceedances were caused by flow distribution problems in the wetland cells. The flow distribution problems caused short circuiting of the effluent in the wetland cells. The written response indicated that the problem(s) had been corrected.

Current Inspection

(1) Effluent monitoring

The inspection entailed an examination of the most recent data from the 3rd quarter of 2004. This examination indicated that the facility had exceeded the Fecal Coliform limit for effluent monitoring on 29 occasions. Twentyeight of these exceedances were greater than 1,600 c.f.u./100ml. The exact cause of the exceedances apparently is not known. The blockage in the liquid chlorine line has reportedly been repaired and the tubing redesigned and the problem is believed to have been eliminated. A pattern appeared to exist during the month of September 2004, when exceedances mostly occurred during the weekends. A number of factors are being considered and investigated, including sampling error (cross contamination) and chlorine demand during certain times caused by algae blooms in the wetland cells. The frequency and magnitude of the exceedances 'triggers' ADEQ's significant non compliance policy and a new Notice of Violation (NOV) will be issued for these continuing and uncorrected violations.

Total Nitrogen monitoring for the 3rd quarter of 2004 did not reveal any exceedances. The effluent monitoring for Total Nitrogen ranged from 6-8 mg/L. The header piping for the effluent distribution to the 16 wetland cells has been cleaned and more evenly distributed to enhance the denitrification process.

The examination of the SMRFs revealed some missing data for five volatile organic compounds (VOCs) from the 2nd quarter of 2004. The data was not provided in the initial submission of the SMRFs because the laboratory had not completed the analysis. This data was provided at the time of the inspection and amended SMRFs will be provided to ADEQ in the ensuing days.

(2) Groundwater monitoring

Ground water monitoring for the various constituents did not reveal any deficiencies. However a laboratory reporting error was noted in that testing for Total Coliform was being reported as < 2 c.f.u./100ml. The permit requires the absence or presence of Total Coliform. During the inspection, the laboratory being utilized by JU, Aquatic Labs, was contacted and informed of the error. Future SMRFs will reflect absence or presence of Total Coliform. A test showing the presence of Total Coliform will require a retest for Fecal Coliform. The absence of Fecal Coliform in the retest will negate any compliance issues. The groundwater monitoring well was reported to have static water levels at 340 feet in recent months.

Reuse Inspection, LTF No. 31083, Permit No. R105412

On October 1, 2003, ADEQ's Water Permits Section issued a Type 3 Reclaimed Water General Permit (Agent) authorizing the facility to irrigate several sites with Class B+ reclaimed water generated by the Section 11 WWTP. This Type 3 Reclaimed Water General Permit authorization supersedes the individual reclaimed wastewater reuse permit previously issued to JU on September 2, 1998 under file No. R103081. The monitoring requirements in the old reuse permit have been incorporated in the APP P103081.

The end users listed in the referenced Reclaimed Water General Permit include the Oasis Golf Course located at 5764 Hunt Highway, Florence, AZ. JU reported during the inspection that effluent has been discharged to the Oasis Golf Course and no other sites. The nine hole golf course at Oasis utilizes most of the effluent being generated by the WWTP. JU was in compliance with the operational irrigation practices at Oasis Golf Course.

The referenced permit requires an annual report on water consumption rates to the various reuse sites. This report is due to ADEQ by the end of the 2004 calendar year.

Compliance Summary:

(1) Monitoring and Reporting Requirements.

(a) The APP No. P103081 requires daily monitoring of the influent for pH and flow. Effluent monitoring is required when discharges occur from the effluent pump station. Effluent is monitored daily for Fecal Coliform, monthly for Total Nitrogen, and quarterly for heavy metals and VOCs. Groundwater monitoring is required monthly for the water level within the well and Total Nitrogen and quarterly for heavy metals and VOCs. The facility experienced numerous violations of the APP monitoring during the 4th quarter of 2003 and the 1st and 2nd quarters of 2004. An NOV was previously issued for these violations. In addition, the facility experienced 29 exceedances during the 3rd quarter of 2004 and a new NOV is being issued for those violations.

Rating: Non Compliance.

(b) The APP also has a compliance schedule which requires the submission of plans and drawings for a new POC well. This requirement was completed. The Compliance Schedule also

requires the submission of an annual report during 2003 which addresses the effect of Nitrogen on the groundwater from the Recharge Project. This has been accomplished.

Rating: Compliance

(c) Groundwater monitoring is also required. No violations were noted during the review of the groundwater monitoring data. **Rating: Compliance**

(d) Type 3 Reclaimed Water General Permit- The monitoring requirements for reclaimed water have been incorporated in the APP. However, an annual report is due to ADEQ. The report should address the total volume of reclaimed water delivered to the reuse sites. No deficiencies were noted regarding this inspection of this permit. **Rating: Compliance.**

2. Operator Certification Requirements. The WWTF is classified as a Class 2 WWTF and the collection system is classified as a Class 2 Collection System. The operator, Gary Bamber, holds a Grade 4 WWT and a Grade 3 WWC license issued by ADEQ.

Rating: Compliance

3. Operation & Maintenance (O&M) Requirements. The facility was in compliance with the operational requirements noted in the APP including freeboard for the ponds and water depth in the wetland cells. **Rating: Compliance**

END OF REPORT

ATTACHMENT 2

JOHNSON UTILITIES COMPANY L.L.C

5230 East Shea Boulevard • Scottsdale, Arizona 85254

PH: (480) 998-3300; FAX: (480) 483-7908

January 19, 2005

William J. Hare
Water Quality Field Service Compliance Unit, MC 5415B-1
Arizona Department of Environmental Quality
1110 W. Washington Street
Phoenix, AZ 85007

RE: Notice of Violation, Case ID #: 33138

Dear Mr. Hare:

On January 3, 2005, the Arizona Department of Environmental Quality (ADEQ) issued Johnson International a Notice of Violation for exceeding the single sample maximum fecal coliform and the limit for the four out of seven samples during the 3rd quarter at the Section 11 Wastewater Treatment Plant, APP P-103081. In accordance with the Part II, Documenting Compliance, Johnson Utilities Company (JUC) is submitting results of the investigative inquiry regarding the cause of the fecal coliform exceedances and the most recent results of effluent sampling.

On September 10, 2004, JUC issued a letter of explanation to ADEQ for previous fecal coliform violations in the 2nd quarter. JUC sited operational difficulties and provided intervention and preventative measures to correct the problem. Attached are copies of the 2004 4th quarter Self Monitoring Report Forms (SMRFs) for the single sample maximum and the four out of seven samples for fecal coliform for the Section 11 Wastewater Treatment Plant (named MGD Precision Golf Course WWTP on the SMRFs). The results show no exceedances of the four out of seven sample limits and 6 exceedances of the single sample maximum where the results are 1.2 times the discharge limit. These results demonstrate compliance within ADEQ's technical review criteria. JUC is pleased to report that compliance has been achieved by the measures implemented.

If you have any questions or comments, please contact me at 480 998-3300.

Sincerely,



Brian Tompsett

Vice President

Johnson Utilities Company

SELF MONITORING REPORT FORM

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Facility Name: MGD-PRECISION GOLF COURSE WWTP Latitude: 33 11 44.9999 Facility ID: 142
 Contact: JOHNSON, GEORGE Longitude: 111 33 29.9999 ADEQ Permit Number: 24069
 Address: Section: 18 Lab ID: AZ0003
 Township: 3 Lab Name: Aquatic
 Range: 8 Date Prepared: 01-15-04
 Quarter: a Reporting Period: 4th QTR 2004

Monitoring Point ID: 12392 Monitoring Name: JOHNSON RANCH - WWTP - EFFLUENT PUMP STATION

Sampling/Reporting Frequencies: Daily Monitoring/QUARTERLY

STORET: 74055 Permit Limit: AL: RSVD DL: 800 AQL: N/A MIN: MAX:
 FECAL COLIFORM (CFU) Method: Units: CFU

ANALYZED	RESULTS	ANALYZED	RESULTS	ANALYZED	RESULTS
01 10/01/04	L2	01 11/01/04	L2	01 12/01/04	L2
02 11/1	71600	02 11/1	L2	02 11/1	L2
03 11/1	—	03 11/1	L2	03 11/1	L2
04 11/1	L2	04 11/1	71600	04 11/1	L2
05 11/1	L2	05 11/1	L2	05 11/1	L2
06 11/1	L2	06 11/1	L2	06 11/1	L2
07 11/1	L2	07 11/1	—	07 11/1	L2
08 11/1	L2	08 11/1	L2	08 11/1	L2
09 11/1	71600	09 11/1	L2	09 11/1	L2
10 11/1	—	10 11/1	L2	10 11/1	L2
11 11/1	L2	11 11/1	L2	11 11/1	L2
12 11/1	L2	12 11/1	L2	12 11/1	L2
13 11/1	L2	13 11/1	71600	13 11/1	L2
14 11/1	L2	14 11/1	—	14 11/1	L2
15 11/1	L2	15 11/1	L2	15 11/1	L2
16 11/1	L2	16 11/1	L2	16 11/1	L2
17 11/1	—	17 11/1	L2	17 11/1	L2
18 11/1	L2	18 11/1	L2	18 11/1	L2
19 11/1	L2	19 11/1	L2	19 11/1	L2
20 11/1	L2	20 11/1	L2	20 11/1	L2
21 11/1	L2	21 11/1	—	21 11/1	L2
22 11/1	L2	22 11/1	71600	22 11/1	L2
23 11/1	L2	23 11/1	71600	23 11/1	L2
24 11/1	—	24 11/1	L2	24 11/1	L2
25 11/1	L2	25 11/1	—	25 11/1	L2
26 11/1	L2	26 11/1	900	26 11/1	L2
27 11/1	L2	27 11/1	30	27 11/1	L2
28 11/1	L2	28 11/1	—	28 11/1	L2
29 11/1	L2	29 11/1	L2	29 11/1	L2
30 11/1	L2	30 11/30/04	L2	30 11/1	L2
31 10/31/04	—	31 11/1	—	31 12/31/04	L2

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION I BELIEVE THE SUBMITTED INFORMATION IS TRUE ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBILITY OF FINES AND IMPRISONMENT.
 SIGNATURE OF PRINCIPLE EXECUTIVE OFFICER OR AUTHORIZED AGENT Thomas Moulton DATE 1-15-05

SELF MONITORING REPORT FORM ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Name: MGD PRECISION GOLF COURSE WWTP Latitude: 33 11 44.9999 Facility ID: 142
 Contact: JOHNSON, GEORGE Longitude: 111 33 29.9999 ADEQ Permit Number: 24069
 Address: _____ Section: 18 Lab ID: AZ 0003
 _____ Township: 3 Lab Name: Aquatic
 _____ Range: 8 Reporting Period: 4th QTR 2004
 _____ Quarter: a Date Prepared: 1-15-05

Monitoring Point ID: 12392 Monitoring Name: JOHNSON RANCH - WWTP - EFFLUENT PUMP STATION

Sampling/Reporting Frequencies: Weekly Monitoring/QUARTERLY

STORET: FC4-7 Permit Limit: AL: RSVD DL: 200 AQL: N/A MIN: _____ MAX: _____
 Chemical: FECAL COLIFORM 4 OF 7 SAMPLES Method: _____ Units: CFU

Sample Date	Analysis Date	Result	Comments
10/01/04	01/15/05	yes	
10/08/04	01/15/05	yes	
10/15/04	01/15/05	yes	
10/22/04	01/15/05	yes	
10/29/04	01/15/05	yes	
11/05/04	01/15/05	yes	
11/12/04	01/15/05	yes	
11/19/04	01/15/05	yes	
11/26/04	01/15/05	yes	
12/04/04	01/15/05	yes	
12/11/04	01/15/05	yes	
12/18/04	01/15/05	yes	
12/25/04	01/15/05	yes	

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION I BELIEVE THE SUBMITTED INFORMATION IS TRUE ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBILITY OF FINES AND IMPRISONMENT.
 SIGNATURE OF PRINCIPLE EXECUTIVE OFFICER OR AUTHORIZED AGENT Thomas Moeller DATE 1-15-05